



Genna A. Conti
Associate

Gibbons P.C.
One Gateway Center
Newark, NJ 07102-5310
Direct: 973-596-4563
gconti@gibbonslaw.com

July 26, 2022

VIA ECF

Honorable Pamela K. Chen, United States District Judge
United States District Court for the Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *United States v. McMahon, et al.*
Docket No. 21-cr-265

Dear Judge Chen,

As Your Honor is aware, this Firm represents Defendant Michael McMahon in the above-captioned matter. I write, with the very gracious consent of the Government, to respectfully request a ten-day adjournment of Mr. McMahon's deadline to file his motion regarding alleged prosecutorial misconduct, which is currently due this Thursday, July 28, 2022; the motion would be due on or before August 8, 2022. The reason for this request is that, unfortunately, I tested positive for COVID-19 on July 8 and was (and am, in part, still) symptomatic, which has certainly affected my ability to work on substantive matters, including this one, until very recently.

In discussing Mr. McMahon's adjournment request, the Government requested, due to the press of other matters, leave to file its opposition on October 13, 2022; we consented that that request, and our Reply on behalf of Mr. McMahon would then be due on October 27, 2022.

If this schedule meets with Your Honor's approval, we would request that the Court So Order the relief sought in the space provided below and file it on the Docket at Your Honor's convenience. Of course, if the Court has any questions or concerns, please do not hesitate to contact me. Thank you very much for your very kind consideration of this matter.

GIBBONS P.C.

July 26, 2022
Page 2

Respectfully submitted,

s/ Genna A. Conti
Genna A. Conti

SO ORDERED:

This ____ day of July, 2022

Honorable Pamela K. Chen
United States District Judge

cc: All counsel of record (via ECF)